1 2 3 4 5 6 7 8	GARMAN TURNER GORDON LLP GREGORY GARMAN, ESQ. Nevada Bar No. 6654 Email: ggarman@gtg.legal TALITHA GRAY KOZLOWSKI, ESQ. Nevada Bar No. 9040 Email: tgray@gtg.legal MARY LANGSNER, Ph.D. Nevada Bar No. 13707 Email: mlangsner@gtg.legal 7251 Amigo Street, Suite 210 Las Vegas, Nevada 89119 Tel: 725.777.3000 Attorneys for Michael Carmel, Chapter 11 Trustee	
9	UNITED STATES BANKRUPTCY COURT	
10	DISTR	ICT OF NEVADA
11	In re:	CASE NO. BK-21-14978-ABL
12	SILVER STATE BROADCASTING, LLC	Chapter 11
13	AFFECTS THIS DEBTOR	Jointly Administered with:
14 15	AFFECTS GOLDEN STATE BROADCASTING, LLC	Golden State Broadcasting, LLC Case No. 21-14979-ABL
16	AFFECTS MAJOR MARKET RADIO, LLC	Major Market Radio, LLC Case No. 21-14980-ABL
17 18	AFFECTS ALL DEBTORS	Hearing Date: August 9, 2023 Hearing Time: 1:30 p.m.
19 20 21 22 23 24 25	APPROVING BID PROCEDURES R ASSETS; (II) SCHEDULING A H APPROVING THE FORM AND MAN ESTABLISHING PROCEDURES F AMOUNTS; AND (V) GRANTING R THE SALE OF DEBTORS' STATE COURSE OF BUSINESS FREE ENCUMBRANCES, AND INTERES SALE AND ASSIGNMENT OF C	E'S MOTION FOR ENTRY OF ORDERS: (A)(I) ELATING TO SALE OF DEBTORS' STATION IEARING TO CONSIDER THE SALE; (III) NER OF NOTICE OF SALE BY AUCTION; (IV) OR NOTICING AND DETERMINING CURE ELATED RELIEF; AND (B)(I) AUTHORIZING ON ASSETS OUTSIDE OF THE ORDINARY CAND CLEAR OF ALL LIENS, CLAIMS, ITS; (II) AUTHORIZING THE ASSUMPTION, ERTAIN EXECUTORY CONTRACTS AND OUT (III) GRANTING RELATED RELIEF
26	NOTICE IS HEREBY GIVEN	that Trustee's Motion for Entry of Orders: (A)(I)
27	Approving Bid Procedures Relating to So	ale of the Debtors' Station Assets; (II) Scheduling a
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Hearing to Consider the Sale; (III) Approving the Form and Manner of Notice of Sale by Auction; (IV) Establishing Procedures for Noticing and Determining Cure Amounts; and (V) Granting Related Relief; and (B)(I) Authorizing the Sale of Debtors' Station Assets Outside of the Ordinary Course of Business Free and Clear of All Liens, Claims, Encumbrances, and Interests; (II) Authorizing the Assumption, Sale and Assignment of Certain Executory Contracts and Unexpired Leases; and (III) Granting Related Relief (the "Motion")¹ [ECF No. 627] was filed on June 22, 2023, by Michael Carmel, in his capacity as the Chapter 11 trustee ("Trustee") of the bankruptcy estates of Silver State Broadcasting, LLC, Golden State Broadcasting, LLC, and Major Market Radio, LLC (collectively, the "Debtors" or "Seller").

Through the Motion, the Trustee seeks an order substantially in the form attached as Exhibit "A" to the Motion (the "Bid Procedures Order") (i) approving the Bid Procedures, (ii) scheduling the Sale Hearing, (iii) approving the Auction Notice, (iv) establishing procedures to determine cure amounts and deadlines for objections to the assumption and assignment of the Assumed Contracts and Leases and approving the Assumption Notice, and (v) granting related relief; and (b) an order substantially in the form attached as Exhibit "B" to the Motion (the "Sale Order") (i) authorizing and approving the sale of Debtors' Assets, (ii) authorizing the sale free and clear of all liens, claims, encumbrances, and interests, (iii) authorizing the assumption and assignment of the Assumed Contracts and Leases, and (iv) granting related relief.

The Motion may be obtained from the above-captioned Bankruptcy Court, located at the Foley Building, 300 Las Vegas Blvd. South, Las Vegas, Nevada 89101, through the Bankruptcy Court's electronic filing system (www.ecf.nub.uscourts.gov/), or by contacting Talitha Gray Kozlowski at 725-777-3000 or tgray@gtg.legal.

NOTICE IS FURTHER GIVEN that if you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then you must file an opposition with the Court, and serve a copy on the person making the Motion *no later* than 14 days preceding the hearing date for the Motion, unless an exception applies (see Local

¹ Capitalized terms not otherwise defined herein shall be as defined in the Motion.

Rule 9014(d)(3)). The opposition must state your position, set forth all relevant facts and legal authority, and be supported by affidavits or declarations that conform to Local rule 9014(c).

If you object to the relief requested, you *must* file a **WRITTEN** response to this Pleading with the court. You *must* also serve your written response on the person who sent you this notice.

If you do not file a written response with the court, or if you do not serve your written response on the person who sent you this notice, then:

- The court may refuse to allow you to speak at the scheduled hearing; and
- The court may *rule against you* without formally calling the matter at the hearing.

NOTICE IS FURTHER GIVEN that pursuant to Administrative Order 2020-14, all hearings are currently being held telephonically absent further order of the Court. The hearing will be held on **August 9, 2023, at the hour of 1:30 p.m.** Parties are permitted to appear telephonically by dialing (669) 254-5252 and entering meeting ID (if applicable): 161 110 6049 and entering access code or passcode 154251#.

DATED this 22nd day of June 2023.

By: /s/ Gregory E. Garman
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